



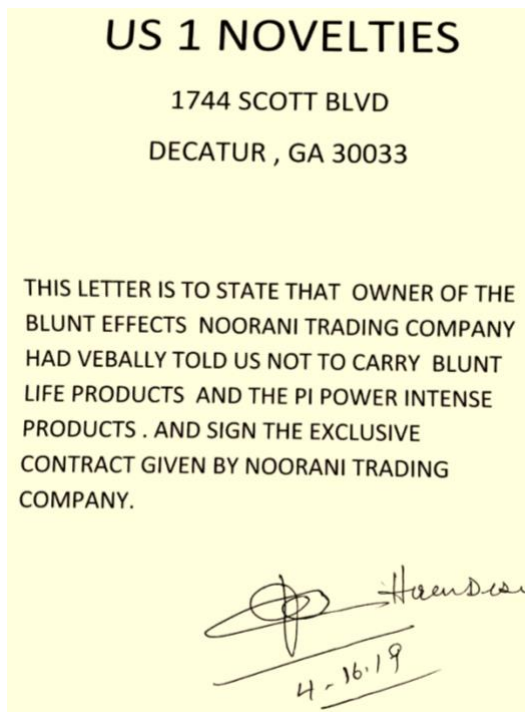
May 1, 2019

A. Todd Merolla, Esq.
Merolla & Gold, LLP
75 14th Street, N.W.
Suite 2130
Atlanta, Georgia 30309

Re: *Noorani v. AB et al. and AB et al. v. Noorani* -- Amendment to Counterclaims

Mr. Merolla,

As you will have noted, the Opposition to Noorani's motion to dismiss the Counterclaims (Doc. 123, filed 4/22/2019) incorporates the Statement of Mr. Hiren Desai of US Novelties.



Specifically, Mr. Desai's Statement notes that counterclaim Defendant Noorani had directed US Novelties not to carry the Defendants' products, including the "PI Power Intense" products.

Inasmuch as the "PI Power Intense" products cannot reasonably be accused of infringement herein, Noorani's communication is considered to be a yet further tortious act.

In light thereof, the counterclaimants will move the Court to amend the Counterclaims.

Please advise as to whether Noorani opposes this amendment.

Thank you,

Sincerely,

Robert M Ward